

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

INTERFOCUS INC., a California Corporation,

Plaintiff,

v.

The Defendants Identified in Schedule A,

Defendants.

Case No.: 1:22-cv-02259

Honorable Steven C. Seeger

**DEFENDANTS' MOTION FOR LEAVE TO FILE UNDER SEAL**

Defendants Hangzhou Hibaby Technology Co., Ltd. (“Hibaby”) and Hibobi Technology Limited (“Hibobi” and, with Hibaby, “Defendants”) file this Motion under Local Rule 26.2 requesting leave to file under seal Exhibits 1-3 to Defendants’ Supplemental Brief Regarding Plaintiff’s Motion for Preliminary Injunction (“Supplemental PI Brief”).

Defendants and Plaintiff InterFocus, Inc. (“Plaintiff”) are competitors. To support their Supplemental PI Brief, Defendants provide the above highly sensitive business document containing financial information and other business information that is not generally known to others and that has significant competitive value. Unrestricted disclosure to the public and to Plaintiff’s employees would create a substantial risk of serious injury. Defendants would not normally reveal this information to third parties except in confidence and has taken measure to maintain the confidence of this information.

This information constitutes proprietary financial, competitive, and commercially sensitive information that Defendants maintain as highly confidential in its business, the disclosure of which is likely to cause harm to the competitive position of Defendants.

Pursuant to Local Rule 26.2(c), concurrent with the motion, Defendants have filed a complete version of Exhibits 1-3 of the Supplemental PI Brief provisionally under seal.

WHEREFORE, Defendants respectfully request this Court grant Defendants' Motion for Leave to File Under Seal.

Dated: November 18, 2022

Respectfully submitted,

/s/ Ziyong Li

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Schedule A: Hangzhou Hibaby  
Technology Co., Ltd. and Hibobi  
Technology Limited*

**CERTIFICATE OF SERVICE**

I certify that, on November 18, 2022, a copy of the foregoing ***Motion to Seal*** was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

/s/ Ziyong Li

Ziyong Li (*pro hac vice*)

*Attorneys for Defendants identified in Schedule  
A: Hangzhou Hibaby Technology Co., Ltd. and  
Hibobi Technology Limited*